

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

CRYSTALLEX INTERNATIONAL CORP.,)
)
Plaintiff,)
)
v.) Misc. No. 17-151-LPS
)
BOLIVARIAN REPUBLIC OF) **PUBLIC VERSION**
VENEZUELA,)
)
Defendant.)

**NOTICE WITH RESPECT TO
CONFIDENTIALITY AGREEMENTS**

OF COUNSEL:

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Counsel for Special Master Robert B. Pincus

Dated: March 24, 2025

Public Version Dated: March 25, 2025

PLEASE TAKE NOTICE THAT, pursuant to the *Sixth Revised Proposed Order* (A) *Establishing Sale and Bidding Procedures*, (B) *Approving Special Master's Report and Recommendation Regarding Proposed Sale Procedures Order*, (C) *Affirming Retention of Evercore as Investment Banker by Special Master and (D) Regarding Related Matters* dated October 11, 2022 (D.I. 481) (the “**Sale Procedures Order**”), the Special Master hereby files under seal at **Exhibit A** hereto each executed Confidentiality Agreement¹ entered into with bidders or potential bidders. See D.I. 481 ¶ 43 (“The Special Master shall file each executed Confidentiality Agreement under seal with the Court and shall provide notice of execution of such Confidentiality Agreement to the Sale Process Parties.”)

Respectfully submitted,
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¹ All capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Sale Procedures Order.